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Co-Counsel for the Class 10 Liquidation Trust

	:	UNITED STATES BANKRUPTCY COURT
In the Matter of:	:	FOR THE DISTRICT OF NEW JERSEY
	:	HONORABLE GLORIA M. BURNS
SHAPES/ARCH HOLDINGS, L.L.C., et	:	CASE NO. 08-14631(GMB)
al.,	:	
	:	(Jointly Administered)
Debtors.	:	•
	:	Chapter 11
	:	
	:	NOTICE OF MOTION OF THE CLASS 10
		LIQUIDATION TRUST FOR AN ORDER
		GRANTING A FURTHER EXTENSION OF
		TIME TO FILE OBJECTIONS TO
		UNSECURED CLAIMS
		HEARING DATE AND TIME:
		November, 2008, atm.
		ORAL ARGUMENT WAIVED UNLESS

**OBJECTIONS TIMELY FILED** 

TO: All Parties-in-Interest

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PLEASE TAKE NOTICE that pursuant to an Order Shortening Time entered by the Bankruptcy Court on November \_\_\_\_\_, 2008, on the \_\_\_\_\_ day of November, 2008, at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon, or as soon thereafter as counsel may be heard, the undersigned, attorneys for the Class 10 Liquidation Trust, shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, New Jersey 08101, for entry of an Order granting a further extension of time to file objections to unsecured claims (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed Order granting the requested relief also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be filed in accordance with the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without further notice or hearing.

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PLEASE TAKE FURTHER NOTICE that the undersigned does not request oral argument unless objections are timely filed.

Respectfully submitted,

**HALPERIN BATTAGLIA RAICHT, LLP**Co-Counsel for the Class 10 Liquidation Trust

By: /s/ Donna H. Lieberman
Donna H. Lieberman
Carrie E. Mitchell

COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A. Co-Counsel for the Class 10 Liquidation Trust

By: <u>/s/ Ilana Volkov</u>
Ilana Volkov

DATED: November 7, 2008